

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

\_\_\_\_\_  
In re

CITY OF DETROIT, MICHIGAN,

Debtor  
\_\_\_\_\_

Chapter 9  
Case No. 13-53846  
Honorable Thomas J. Tucker

**RESPONSE TO DEBTOR'S FIFTEENTH OMNIBUS  
OBJECTION TO CERTAIN CLAIMS**

(No Basis Claims)

The Creditor, **Thomas M. Nunley**, Claim No. 2780, (the "Creditor"), by and through his counsel, for his response states as follows:

**JURISDICTION AND VENUE**

1. Admit.

**BACKGROUND AND FACTS**

2. Admit.

3. Admit.

4. Admit.

5. Admit.

6. Admit.

7. Admit.

8. Admit.

9. Neither Admitted nor Denied. Creditor lacks specific knowledge to each and every claim listed in Exhibit 2 and leaves Debtor to its proofs. Denied as it relates to allegations related to Creditor's claim.

10. Neither Admitted nor Denied. Creditor lacks specific knowledge as to this allegation and leaves Debtor to its proofs.

**RELIEF REQUESTED**

11. Neither Admitted nor Denied. Creditor lacks specific knowledge to each and every claim listed in Exhibit 2 and leaves Debtor to its proofs. Denied as it relates to allegations related to Creditor's claim.

12. Neither Admitted nor Denied.

**BASIS FOR RELIEF REQUESTED**

13. Admit.

14. Admit.

15. Neither Admitted nor Denied. Creditor lacks specific knowledge to each and every claim listed in Exhibit 2 and leaves Debtor to its proofs. Denied as it relates to allegations related to Creditor's claim.

16. Admit.

17. Neither Admitted nor Denied. Creditor lacks specific knowledge to each and every claim listed in Exhibit 2 and leaves Debtor to its proofs. Denied as it relates to allegations related to Creditor's claim.

18. Admit.

19. Neither Admitted nor Denied. Creditor lacks specific knowledge to each and every claim listed in Exhibit 2 and leaves Debtor to its proofs. Denied as it relates to allegations related to Creditor's claim.

20. Neither Admitted nor Denied. Creditor lacks specific knowledge to the allegations therein and leaves Debtor to its proofs.

**NO EFFECT ON CLAIMS THAT ARE NOT SUBJECT TO TREATMENT IN CLASSES  
3, 14, OR 15 UNDER THE PLAN**

21. Neither Admitted nor Denied.

**SEPARATE CONTESTED MATTERS**

22. Neither Admitted nor Denied.

**RESERVATION OF RIGHTS**

23. Neither Admitted nor Denied.

**NOTICE**

24. Neither Admitted nor Denied.

**NO PRIOR REQUEST**

25. Neither Admitted nor Denied.

WHEREFORE, the Creditor respectfully requests that this Court deny the City's requested relief as to Creditor only, and any other further relief this Court may deem just and proper.

*Respectfully Submitted,*

/s/ Joshua J. Wheelock

By: \_\_\_\_\_

**JOSHUA J. WHEELOCK (P76512)**

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DATED: July 10, 2015